



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20543

RQ-2

Michael L. Retzer, Treasurer
Republican National Committee
310 First Street SE
Washington, DC 20003

DEC 3 8 2002

Identification Number: C00003418

Reference: Amended October Monthly Report (9/1/01-9/30/01), received 4/26/02

Dear Mr. Retzer:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Please clarify all expenditures made for ADVERTISING COST, MEDIA SVS, PRODUCTION COST, VIDEO SVS, VIDEO SERVICE, and BROADCASTING COST on Schedule(s) H4. If a portion or all of these expenditures were made on behalf of specifically identified federal candidates, this amount should be disclosed on Schedules B, E, or F supporting Lines 23, 24, or 25 and include the amount, name, address and office sought by each candidate. 11 CFR §§104.3(b) and 106.1

-Schedule H2 indicates the allocation ratio for P9 was revised during the reporting period. Please provide the date of the fundraising program or event. In the case of a telemarketing or direct mail campaign, the "date" is the last day of the telemarketing campaign, or the day on which the final direct mail solicitations are mailed. 11 CFR §106.5(f)(2) In the event that an excessive non-federal transfer was received, the excessive amount should be transferred back to your non-federal account.

-Itemized disbursements must include a brief statement or description of why the disbursements were made. Please amend Schedule(s) H4 of your report to clarify the following description(s): SUPPLIES and TRANS. For further guidance regarding acceptable purposes of disbursements, please refer to 11 CFR §104.3(b)(3).

-On Schedule H4 supporting Line 21(a) of the Detailed Summary Page, you have failed to check the appropriate CATEGORY box for the payment(s) made to numerous vendors. Please amend your report to disclose the appropriate category.

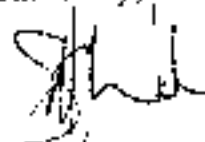
-Line 1 of Schedule 1 for your Non-Federal Corporate account discloses \$4,844,176.66 in total receipts. The sum of the entries itemized on memo Schedule A, however, indicates the total to be \$4,801,440.46. Please clarify whether this discrepancy is attributed to receipts from sources aggregating \$200 or less or provide further clarification.

-Schedule H3 of your report discloses the receipt of \$542.61 and \$19,295.02 from your non-federal account for the fundraising events P8 and S8, respectively, which were revised to 100% non-federal fundraising events on the Amended September Monthly Report (8/1 - 8/31/), received 4/26/02. A committee is permitted to pay the entire amount of an allocable activity from its federal account and receive a transfer from its non-federal account solely to cover the non-federal share of allocable expenses. 11 CFR §106.5(g)(i). However, a 100% non-federal fundraising event does not fall within the definitions of an allocable expense, and constitutes an impermissible transfer of funds received by your federal account from your non-federal account.

The Commission recommends you immediately transfer the total amount received by your federal account back to your non-federal account. Although the Commission may take further legal action concerning this prohibited activity, your prompt action will be taken into consideration.

A response or amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530 (at the prompt press 1, then press 2 to reach the Reports Analysis Division). My local number is (202) 694-1130.

Sincerely,



Scott Walker

Senior Campaign Finance Analyst
Reports Analysis Division

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